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October 23, 2019

By CM/ECF

The Chambers of the Honorable Judge Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Elliott v. Donegan, et al.*, No. 1:18-civ-05680-LDH-SJB

Dear Judge Bulsara:

I write on behalf of Defendant Moira Donegan in response to Plaintiff Stephen Elliott's letter requesting a conference with Your Honor (ECF 49). As the letter explains, Ms. Donegan has no objection to a conference, and her counsel can be available at the times Plaintiff's counsel proposes.

The letter is also correct that Ms. Donegan believes she has no relevant information to offer Mr. Elliott in his attempts to identify the Doe Defendants, and that she opposes any effort to obtain discovery from her while her motion to dismiss this case is pending. However, the letter has somewhat inaccurately portrayed a representation I made during the parties' meet and confer on October 21, 2019. I am happy to clarify that issue during the requested conference.

Respectfully Submitted,



Roberta A. Kaplan, Esq.
Kaplan Hecker & Fink LLP

Counsel for Defendant Moira Donegan